

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

INTEGRATED GLOBAL SERVICES, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	C.A. No. _____
CORMETECH, INC.,)	
)	
Defendant.)	JURY TRIAL DEMANDED
)	

DECLARATION OF ANDREW KLINE


I, Andrew Kline, declare as follows:

1. I am over the age of eighteen years and am otherwise competent to testify.
2. I am the Senior Manager of IGS Environmental at Integrated Global Services, Inc. ("IGS").
3. I make this declaration based on my personal knowledge or have inquired into and been informed of the facts stated herein and, if called to testify to the truth of the matters declared herein, I could and would testify competently.
4. During a conversation with Bryan Britt of Duke Energy's Belews Creek facility at the Reinhold conference in June 2018, Bryan informed me that Cormetech offered to supply protective catalyst screens with their catalyst that are the same as, and offer the same technical benefits as, the LPA screens offered by IGS.
5. Bryan further indicated to me that Duke Energy's Belews Creek facility would obtain the Cormetech catalyst screens for the clean SCR project at Belews Creek.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

AK

Executed on September 4, 2020


Andrew Kline
9/4/2020